

**Carsten, Douglas**

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**From:** mak@kramerlawip.com  
**Sent:** Wednesday, March 05, 2008 7:28 AM  
**To:** Carsten, Douglas  
**Cc:** michael@kalerlaw.com; esbjork@gmail.com  
**Subject:** RE: Sorensen v Sanyo

Dear Mr. Carsten,

I will prepare a stipulation and forward it to you promptly. I am out of town today, but should have it ready for you tomorrow. Also, we will endeavor to have a proposal regarding discovery to you by March 31st.

Sincerely,

Melody A. Kramer

> ----- Original Message -----

> From: "Carsten, Douglas" <DCarsten@foley.com>

> To: mak@kramerlawip.com

> Subject: RE: Sorensen v Sanyo

> Date: Tue, 4 Mar 2008 13:51:00 -0800

>

>

> Hello Ms. Kramer,

>

> Thank you for your email. Sanyo accepts your offer of an additional  
 > thirty days in which to respond to the complaint. By my calculation,  
 > that would place Sanyo's response date up to and including April 9,  
 > 2008. If my calculation is incorrect, please do not hesitate to let  
 > me know. In addition, please let me know if you would be so kind as  
 > to prepare a suitable stipulation acceptable to Sorensen for my review.

>

> I presume from your email that this extension will serve to allow you  
 > to further determine the terms Sorensen would request in connection  
 > with a proposed partial stay. I would appreciate your providing to me  
 > whatever proposal Sorensen has in mind for such a partial stay on or  
 > before March 31, 2008 so that Sanyo has appropriate time to digest  
 > your proposal in advance of the response date. I would also request  
 > that such a proposal specifically set forth what discovery (if any)  
 > Sorensen would request in connection with such a partial stay. Please  
 > let me know at your earliest convenience if you agree to providing  
 > that information in the stated timeframe.

>

> I look forward to hearing from you.

>

> Truly yours,

>

> Doug Carsten

>

> -----Original Message-----

> From: mak@kramerlawip.com [mailto:mak@kramerlawip.com]

> Sent: Tuesday, March 04, 2008 9:59 AM

> To: Carsten, Douglas

> Cc: michael@kaler.com

> Subject: Sorensen v Sanyo

>

> Dear Mr. Carsten:

>

> Thank you for your email of February 28th.  
 > Based on some recent developments, I will not be in a position to  
 > forward you a proposed stipulation for partial stay of this case yet.  
 > Comments by Judge Moskowitz in a related proceeding (transcript  
 > attached), as well as new information that we presented to the Court

> in opposition to another motion for stay (memorandum attached), place  
> the entire landscape of the scope and duration of any stay that the  
> Court may enter in substantial question.  
>  
> If Sanyo would like to have an additional 30 days before having to  
> respond to the Complaint, we are amenable to such a stipulation.  
>  
> Melody A. Kramer  
> Kramer Law Office, Inc.  
> 9930 Mesa Rim Road, Suite 1600  
> San Diego, CA 92121  
> 858/362-3150 direct  
> 858/824-9073 fax  
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